

Presentment Date: March 14, 2022 at 10:00 a.m. (Prevailing Eastern Time)
Objection Deadline: March 11, 2022 at 4:00 p.m. (Prevailing Eastern Time)

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

JPA NO. 111 CO., LTD. and
JPA NO. 49 CO., LTD.,

Debtors.¹

Chapter 11

Case No.: 21-12075 (DSJ)

Jointly Administered

**NOTICE OF PRESENTMENT OF STIPULATED CONFIDENTIALITY
AGREEMENT AND [PROPOSED] PROTECTIVE ORDER**

PLEASE TAKE NOTICE that the above-captioned debtors and debtors in possession (together, the “Debtors”), through their undersigned counsel, in accordance with Local Rule 9074-1, will present the proposed *Stipulated Confidentiality Agreement and [Proposed] Protective Order*, annexed hereto as **Exhibit 1** (the “Proposed Order”), to the Honorable David S. Jones, United States Bankruptcy Judge, in his Chambers, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Room 501, New York, New York 10004-1408, at **10:00 a.m. (prevailing Eastern Time) on March 14, 2022 (the “Presentment Date”)**, for approval and signature.

PLEASE TAKE FURTHER NOTICE that if approved, the Proposed Order will govern discovery in the Debtors’ chapter 11 cases as set forth therein.

¹ The Debtors in these Chapter 11 Cases are: JPA No. 111 Co., Ltd. and JPA No. 49 Co., Ltd. The Debtors’ corporate address is Kasumigaseki Common Gate West Tower, 3-2-1 Kasumigaseki, Chiyoda-Ku, Tokyo 100-0013, Japan.

PLEASE TAKE FURTHER NOTICE that unless a written objection to the Proposed Order is filed with the Court in accordance with customary practices of the Court and General Order M-399 and served upon: (i) Togut, Segal & Segal LLP, counsel for the Debtors, Attn: Frank A. Oswald, Esq. (frankoswald@teamtogut.com) and Kyle J. Ortiz, Esq. (kortiz@teamtogut.com); and (ii) the chambers of the Honorable David S. Jones at: jones.chambers@nysb.uscourts.gov, so as to be received by **March 11, 2022, at 4:00 p.m.** (Prevailing Eastern Time) (the “Objection Deadline”), there will not be a hearing to consider the Proposed Order absent questions from the Court, and the Proposed Order may be signed and entered by the Court.

PLEASE TAKE FURTHER NOTICE that if a written objection to the Proposed Order is timely filed and served, a hearing (the “Hearing”) will be scheduled to consider the Proposed Order before the Court at a date and time to be announced. Objecting parties are required to telephonically appear at any hearing and a failure to appear may result in relief being granted without further action of the Court.

PLEASE TAKE FURTHER NOTICE that General Order M-543, along with other temporary procedures implemented by the Bankruptcy Court in connection with the COVID-19 pandemic (including electronic filing procedures for pro se parties) can be found by visiting www.nysb.uscourts.gov (the “Bankruptcy Court’s Website”) and clicking on the “Coronavirus COVID-19 Protocol” banner.

[Concluded on the following page]

PLEASE TAKE FURTHER NOTICE that if no timely, written objections are filed and received in accordance with the foregoing, the Proposed Order may be entered by the Court.

DATED: New York, New York
March 7, 2022

TOGUT, SEGAL & SEGAL LLP,
Counsel to the Debtors and Debtors in Possession
JPA NO. 111 CO., LTD. and
JPA NO. 49 CO., LTD.
By:

/s/Jared C. Borriello
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